

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Laura H.W. Chung,)	
)	
Plaintiff,)	CIVIL ACTION NO.
)	05-11258 WGY
vs.)	
)	
ZS Associates, Inc.)	
Arun Shastri,)	
)	
Defendants.)	

ANSWER TO COUNTERCLAIM

Now comes the Plaintiff, Laura H.W. Chung, by her attorney, and respectfully submits herein her Answer to Defendants' Counterclaim.

COUNT I
(Breach of Contract)

1. Plaintiff Admits that the July 26, 2004 offer of employment speaks for itself. To the extent this paragraph contains additional factual allegations, the same are Denied.
2. Plaintiff Admits that ZS terminated her employment less than one year after she commenced employment with ZS. All additional allegations contained in this paragraph are Denied.
3. Denied.
4. Admitted.
5. This paragraph states a legal conclusion to which no response is required. To the extent this paragraph contains factual allegations, the same are Denied.

First Affirmative Defense

Defendant fails to state a claim upon which relief can be granted.

Second Affirmative Defenses

Defendant's claims are barred by the doctrines of estoppel and/or unclean hands.

Third Affirmative Defense

The termination of Plaintiff's employment with ZS was without cause.

Fourth Affirmative Defense

Defendant's claims are made in retaliation for Plaintiff opposing unlawful discrimination and retaliation in employment, further constituting an abuse of process.

WHEREFORE, the Plaintiff demands that the Defendant's counterclaim be dismissed with prejudice, with costs awarded to the Plaintiff.

Respectfully submitted,
Laura H.W. Chung
By her attorney,

/s/ Paul F. Wood
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